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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

JAN - 8 2003

By: *Ch. Caucher*
Deputy Clerk

RICK REEVES,

Plaintiff,

v.

WORLD CHAMPIONSHIP WRESTLING, INC.,

TURNER SPORTS, INC. and TURNER,

BROADCASTING SYSTEM, INC.,

Defendants.

CIVIL ACTION FILE

NO. 1:00-CV-1720-CC

DEFENDANTS' NOTICE OF FILING APPENDIX

Defendants Universal Wrestling Corporation (f/k/a World Championship Wrestling, Inc.), Turner Sports, Inc. and Turner Broadcasting System, Inc. (collectively "Defendants") hereby serve notice that they are filing herewith in the above-captioned case an Appendix containing copies of relevant deposition testimony and exhibit documents in support of Defendants' Motion for Summary Judgment filed with this Court.

This 8th day of January, 2003.

Evan H. Pontz

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JAMES A. LAMBERTH
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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

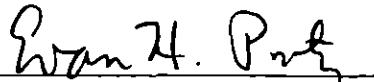
RICK REEVES,)	
)	
Plaintiff,)	
)	CIVIL ACTION FILE
v.)	
)	NO. 1:00-CV-1720-CC
WORLD CHAMPIONSHIP WRESTLING, INC.,)	
TURNER SPORTS, INC. and TURNER,)	
BROADCASTING SYSTEM, INC.,)	
)	
Defendants.)	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of
DEFENDANTS' NOTICE OF FILING APPENDIX upon the interested
parties by hand delivery to:

Cary Ichter
Kelly Jean Beard
Charles Gernazian
Michelle M. Rothenberg-Williams
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This 8th day of January, 2003.


EVAN H. PONTZ
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FILED IN CLERK'S OFFICE
U.S.D.C. ATLANTA

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

dm JAN 08 2003

EDWARD J. THOMAS, Clerk
By: *Chleucher*
Deputy Clerk

RICK REEVES,

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WORLD CHAMPIONSHIP WRESTLING, INC.,
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APPENDIX OF DEPOSITION EXCERPTS AND EXHIBITS

INDEX

1. Deposition of Joseph N. Hamilton
2. Deposition of James A. Morrison
3. Deposition of Rick M. Reeves



EXHIBIT / ATTACHMENT



(To be scanned in place of tab)

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

Walker v. World Championship Wrestling, Inc., Turner Sports, Inc., Civ. File No. 100-CV-0367-CC
Onoo v. World Championship Wrestling, Inc., Turner Sports, Inc., Civ. File No. 1:00-CV-0368-CC
Norris v. World Championship Wrestling, Inc., Turner Sports, Inc., Civ. File No. 1:00-CV-0369-CC
Easterling v. World Championship Wrestling, Inc., Turner Sports, Inc., Civ. File No. 1:00-CV-1715-CC
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Reeves v. World Championship Wrestling, Inc. and Turner Sports, Inc., Civ. File No. 1:00-CV-1720-CC
Patterson v. World Championship Wrestling, Inc., Turner Sports, Inc. and Turner Entertainment Group, Inc., Civ. File No. 1:01-CV-1152-CC

DEPOSITION OF JOSEPH N. HAMILTON
MARCH 22, 2002
1:30 P.M.

COPY



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1 opportunities at The Power Plant?

2 A Ask me?

3 Q Yes, sir.

4 A No.

5 Q How about Rick Reeves? Do you remember
6 Rick Reeves?

7 A Never heard of him.

8 Q How about Lester Speight? Somebody Rasta.
9 Do you remember him?

10 A Yeah.

11 Q Okay. Did you ever push him?

12 A Never had a chance.

13 Q Why was that?

14 A He took off and went to Europe. And when
15 he come back from Europe, he informed everybody that
16 he had this big role in some big movie and so on. And
17 he called down there a couple times from -- while he
18 was supposed to be on the set and telling us how great
19 he was doing. So that was the last I ever heard of
20 him.

21 Q How did you evaluate him when he was
22 wrestling at The Power Plant?

23 A He was -- he was learning. He was green,
24 but he was starting to learn.

25 Q So you're saying you didn't have a chance



EXHIBIT / ATTACHMENT

2

(To be scanned in place of tab)

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

DAVIS v. WORLD CHAMPIONSHIP WRESTLING, INC. and TURNER
SPORTS, INC., CIV. FILE NO. 1:00-CV-1716-CC;
SAENGSI PHAN v. WORLD CHAMPIONSHIP WRESTLING, INC. and
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SPEIGHT v. WORLD CHAMPIONSHIP WRESTLING, INC. and TURNER
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REEVES v. WORLD CHAMPIONSHIP WRESTLING, INC. and TURNER
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PATTERSON v. WORLD CHAMPIONSHIP WRESTLING, INC. and TURNER
SPORTS, INC., and TURNER ENTERTAINMENT GROUP, INC.,
CIV. FILE NO. 1:00-CV-1152-CC;

COPY

DEPOSITION OF JAMES A. MORRISON
MAY 17, 2002
10:10 A.M.



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1 of fundamentals. There was a feeling that there is a
2 psychology to wrestling and a wrestling match that had
3 become somewhat of a lost art.

4 And to try and teach the students that were
5 out there the art of the psychology, even if it was
6 something that maybe wasn't as critical to their initial
7 success on television, it was knowledge that would serve
8 them well in the future if they got a break and capitalized
9 on it and something came of it. So there was a lot of time
10 spent on fundamentals, the psychology of why you do
11 something and when you do something and how you do
12 something.

13 Q Do you know who Darron Easterling is?

14 A I'm not familiar with that name.

15 Q Do you know who Rick Reeves is?

16 A I'm not familiar with that name.

17 Q Do you know who Bounthan Saengsiphon is?

18 A If that's the kid from Cambodia, I know who
19 he is.

20 Q Yes.

21 A Yes.

22 Q Well, was Bounthan one of the people who did
23 this --

24 A Yes.

25 Q -- tryout to get to the second Power Plant,



EXHIBIT / ATTACHMENT

3

(To be scanned in place of tab)

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

DAVIS v. WORLD CHAMPIONSHIP WRESTLING, INC. and TURNER
SPORTS, INC., CIV. FILE NO. 1:00-CV-1716-CC;
SAENGSI PHAN v. WORLD CHAMPIONSHIP WRESTLING, INC. and
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ONOO v. WORLD CHAMPIONSHIP WRESTLING, INC. and TURNER
SPORTS, INC., CIV. FILE NO. 1:00-CV-0368-CC;
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SPORTS, INC., CIV. FILE NO. 1:00-CV-0367-CC;
PATTERSON v. WORLD CHAMPIONSHIP WRESTLING, INC. and TURNER
SPORTS, INC., and TURNER ENTERTAINMENT GROUP, INC.,
CIV. FILE NO. 1:00-CV-1152-CC;

DEPOSITION OF RICK M. REEVES
MARCH 27, 2002
9:55 A.M.



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1 Q Let me ask you a little bit about
2 professional wrestling. I take it you claim that you used
3 to be involved in professional wrestling?

4 A That's correct.

5 Q Are you no longer involved in professional
6 wrestling?

7 A Well, actually, I'm booked on a show
8 Saturday.

9 Q Well, we'll get to that in a minute. When
10 did you first get involved in professional wrestling?

11 A I'd say about 1993.

12 Q What did you do? What was your first
13 involvement in professional wrestling?

14 A Well, actually, I would say about '92.

15 Q What did you start doing in '92 in the way
16 of professional wrestling?

17 A I had been, Thunderbolt Patterson and I were
18 working at the union together, and he started to train me a
19 little bit to wrestle professionally.

20 Q So Mr. Patterson showed you how to do
21 wrestling moves. And did you work out in a gym with him?

22 A Yes.

23 Q Did you wrestle professionally anywhere in
24 1992?

25 A No.

1 Q How about in 1993, did you wrestle
2 professionally anywhere?

3 A That's when I got involved with WCW.

4 Q Before you got involved with WCW, had you
5 ever professionally wrestled anywhere?

6 A No.

7 Q So you basically had prepared yourself to be
8 a wrestler with Mr. Patterson, and then you, did he
9 approach WCW?

10 A We approached them, yeah.

11 Q The two of you together?

12 A (Whereupon, the witness nodded
13 affirmatively.)

14 Q Who did you approach at WCW?

15 A Ole Anderson.

16 Q Do you remember where this, you had a
17 meeting with Mr. Anderson?

18 A Yes.

19 Q Do you remember where the meeting with
20 Mr. Anderson was?

21 A I can't remember exactly where it was.

22 Q No idea at all?

23 A No.

24 Q Was it a restaurant or at the gym?

25 A I can't, I really can't remember.

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1 Q But you remember having a meeting with
2 Mr. Patterson and Mr. Anderson?

3 A Yes.

4 Q Was there anybody else there?

5 A No.

6 Q What was said at that meeting that you
7 recall?

8 A Well, at that time, Thunderbolt was going to
9 bring me into the business as his son.

10 Q And you told Mr. Anderson you were his son?

11 A Yes.

12 Q Now, you're not his actual son; right?

13 A No.

14 Q Did Mr. Anderson know you weren't his actual
15 son?

16 A I don't know whether he actually knew or
17 not, I mean, because it was common practice to, you know,
18 to do that.

19 Q For Mr. Patterson to present someone as his
20 son?

21 A No. It was common practice for people to be
22 brought into the business as son of such and such.

23 Q Got you. Did you use the name Patterson
24 when you first approached Mr. Anderson?

25 A Well, we never talked about last names. He

1 just said it's my son, Rick.

2 Q And what else was said at that conversation
3 with Mr. Anderson?

4 A He said that, you know, "This is my son
5 Rick. And I've been training him. And he's ready to
6 work."

7 Q That's what Mr. Patterson said?

8 A Uh-huh.

9 Q And how did Mr. Anderson respond?

10 A Ole said, "Okay. Well, you know, start
11 coming to the tapings and we'll get him worked in."

12 Q Was it Mr. Patterson's idea to introduce you
13 to Ole Anderson?

14 A That was my idea, too, but yeah.

15 Q The two of you agreed to do it?

16 A Yes.

17 Q But he was the one who knew Mr. Anderson?

18 A That's correct.

19 Q And Mr. Anderson said something about
20 attending tapings?

21 A That's correct.

22 Q What was that that he was talking about, as
23 you understood it?

24 A He told me to start coming to the TV tapings
25 and that he'd get me worked into the show.

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1 Q Where were these TV tapings held?

2 A At various places.

3 Q Like where?

4 A Down in Gainesville, up at the Center
5 Stage. It was in Aiken, South Carolina, just various
6 places. I don't know all, I can't remember all of them.

7 Q Did Mr. Anderson say why he would be
8 interested in having you coming to TV tapings?

9 A Because he said that he, you know, would get
10 me worked into whatever, you know, what they were doing,
11 you know.

12 Q Was it your understanding that he was doing
13 this as a favor to Mr. Patterson?

14 A No. It was my understanding that he'd be
15 giving me a job.

16 Q And you went to some TV tapings?

17 A That's correct.

18 Q What TV tapings do you remember going to?
19 How many did you go to?

20 A I can't remember.

21 Q Was it more than three?

22 A Yes.

23 Q More than six?

24 A Yes.

25 Q More than a dozen?

1 A Yes.

2 Q Is this in 1993?

3 A Yes.

4 Q Did you go to TV tapings in 1994 as well?

5 A I went to some, not as many.

6 Q Can you give me some ballpark estimate of
7 how many TV tapings you went to?

8 A Total?

9 MS. ROTHENBERG: Objection. Vague.

10 MR. PONTZ: Let me rephrase it.

11 MS. ROTHENBERG: In '93 or '94?

12 BY MR. PONTZ:

13 Q How about in 1993 and 1994, how many TV
14 tapings do you believe you went to?

15 MS. ROTHENBERG: Each year or --

16 MR. PONTZ: Total.

17 MS. ROTHENBERG: -- total both years?

18 MR. PONTZ: Total.

19 THE WITNESS: I really can't say. I can't
20 remember. It was quite a few.

21 BY MR. PONTZ:

22 Q Was it more than 20, you believe?

23 A Yes.

24 Q Did you get to wrestle at any of these TV
25 tapings?

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1 A No.

2 Q Mr. Reeves, why did you keep going to more
3 than a couple of TV tapings if you didn't get to wrestle
4 when you went?

5 A Because Ole asked me to keep coming. And he
6 said that he'd get me worked into the show, and so I kept
7 going.

8 Q So other than speaking to Mr. Anderson and
9 him telling you to keep coming to the tapings, did you
10 speak to anyone else at WCW about getting a wrestling
11 opportunity?

12 A Well, at that particular time, you know, Ole
13 had the ability to write the deals himself.

14 Q So you just talked with Mr. Anderson?

15 A That's correct.

16 Q And this was in 1993 and 1994?

17 A Well, I went to other tapings later, I mean,
18 you know, in other years.

19 Q At some point in 1994, did you stop going to
20 tapings for at least a little while?

21 A Yeah. I missed some. I didn't do it like I
22 was doing it in '93.

23 Q Well, let's talk about '93 and '94, then,
24 for the moment. And we'll get to stuff going forward after
25 that. Did you feel like the reason you weren't getting to

1 wrestle in 1993 and 1994 when you went to these tapings was
2 because of your race?

3 A Yes.

4 Q Did you express that to anyone?

5 A I wanted to, but I didn't, because I'm, I
6 still wanted to work for the company. I knew if I had said
7 something, it would have been some kind of retaliation.

8 Q No one ever said, if you complain about
9 discrimination, we'll retaliate against you?

10 A Well, they didn't have to say it, but you
11 knew.

12 Q That was your belief?

13 A Yes.

14 Q And you also believed that it was your race
15 that was keeping you from getting an opportunity?

16 A Yes.

17 Q Why do you believe that?

18 A Simply because I was there, I was trained
19 and I was ready to work, and there were a lot of guys that
20 came in after I did that instantly, you know, were put to
21 work.

22 Q Who were some of those people?

23 A Chuck Palumbo.

24 Q This was in 1993 or 1994?

25 A Well, this was later.

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1 Q Let's for the moment focus on 1993 and
2 1994.

3 A Okay.

4 Q And we'll get to the later stuff. But
5 focusing on those two years, you believe that you were
6 discriminated against on the basis of your race back then
7 and not getting chances to wrestle; right?

8 A That's correct.

9 Q And you said you believe that because you
10 saw other wrestlers come in who got opportunities?

11 A That's correct.

12 Q Were these white wrestlers?

13 A That's correct.

14 Q Who was it, who were the white wrestlers who
15 you recall who you believe got opportunities you should
16 have gotten?

17 A Scott -- Kevin Nash, Scott Hall. You're
18 just talking about that one time period; is that correct?

19 Q Yes. The '93 and '94 time period.

20 A There's some other guys, but I just can't
21 remember all their names.

22 Q Those are the only two you can remember?

23 A At this point, that's all I can remember
24 right now.

25 Q Did you know Mr. Nash's prior history in

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1 '93 and '94, do you?

2 A Ole.

3 Q Did Ole tell you he did that?

4 A Well, Ole put them to work.

5 Q Did you see him put them to work?

6 A Well, I saw them working on TV, working
7 shows.

8 Q So you assumed it was Mr. Anderson who had
9 given them that opportunity?

10 A That's correct.

11 Q When you went to these tapings, this would
12 just be one day at a time?

13 A Yeah. They'd be taping it one day.

14 Q You'd go and you'd wait around hoping that
15 someone would use you in a wrestling match?

16 A That's correct.

17 Q Did you basically just sit around and wait
18 to hear your name?

19 A Yeah. I'd go to Ole, I'd say, "Ole, is
20 today my day?" And he'd say, "Just hang in there, kid."

21 Q Were there other guys hanging around hoping
22 to get in?

23 A During that time period, I don't, I can't
24 remember. I don't think so, but I don't know that to be a
25 fact. Excuse me. Can I get some water?

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1 tapes.

2 Q Were these videotapes of you wrestling?

3 A Yeah.

4 Q Were they somebody set up a video camera at
5 one of the mom and pop shows?

6 A Yeah.

7 Q And you sent them in to WCW?

8 A Uh-huh.

9 Q And this was in 1995 you started doing that?

10 A Started sending -- I had some tapes before,
11 but I started sending them in.

12 Q The first time you started sending them in
13 was in 1995 that you recall?

14 A I believe I sent some in prior to that, but
15 I can't remember exactly.

16 Q To whom did you send the tapes at WCW?

17 A I forgot the guy's name. You know, you just
18 send a tape to, it was a Post Office box.

19 Q Was it --

20 A But I can't --

21 Q Was it addressed to any particular person at
22 WCW?

23 A I forgot who the talent guy was at that
24 time.

25 Q What was the position that you think this

1 person held?

2 A I think, oh, I sent some, I just thought
3 about, I sent some to -- no, that's not right. I'm trying
4 to think of the guy's name. I can't.

5 Q How many tapes do you believe you sent to
6 WCW?

7 A I'd say probably about seven or eight.

8 Q So generally, each tape would be one
9 wrestling match, you think?

10 A Two.

11 Q Two matches?

12 A Maybe three. I can't remember exactly.

13 Q Did you send anything along with the tapes?

14 A You know, a letter, you know, with my name
15 and address and, you know, I told them take a look at the
16 tapes, and if there's an opportunity, then you can reach
17 me, this is how you can reach me.

18 Q Anything other than the tapes and a letter?

19 A Well, and phone calls.

20 Q Well, let's hang on a second. Stick to what
21 you sent in in these packages to WCW.

22 A Uh-huh.

23 Q Was there anything in those packages other
24 than the videotape and a letter asking someone to take a
25 look --

Page 47

1 A That's --

2 Q -- and give you a call?

3 A That's all I can recall.

4 Q And you can't recall who it was you sent
5 them to?

6 A I can't remember the guy's name. I have --
7 I just can't think of it right now.

8 Q It was one particular person?

9 A Yes.

10 Q And you recall sending, I think you said,
11 seven or eight tapes total to WCW?

12 A Thereabout.

13 Q Were these all sent in 1995?

14 A Some prior to that.

15 Q Did you send any tapes after 1995?

16 A Some.

17 Q When did you send tapes after 1995? Do you
18 recall?

19 A I'd really have to -- I don't recall the
20 dates, no.

21 Q Do you think it was a few months after
22 1995? The next year maybe?

23 A Probably the next year.

24 Q You don't know if anyone at WCW ever looked
25 at the tapes you sent in, do you?

1 A No, I don't.

2 Q And you don't know if WCW had any policies
3 about whether to review unsolicited tapes or not, do you?

4 A I don't know what their policy was, no.

5 Q Do you believe you sent all the tapes to the
6 same person?

7 A No. Because they changed. I sent some
8 tapes to J.J. Dillon.

9 Q So you sent tapes to someone at WCW, and
10 then later, you sent them to J.J. Dillon?

11 A Uh-huh.

12 Q Have you ever met Mr. Dillon?

13 A Once, I think.

14 Q When do you recall meeting Mr. Dillon?

15 A I think I met him over on Howell Mill Road
16 at the training center.

17 Q Do you remember when that was?

18 A No. I don't recall.

19 Q Is this during the time you were attending
20 tapings?

21 A No.

22 Q Was this before that?

23 A It was after.

24 Q After that? You don't remember when that
25 was?

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1 A No.

2 Q And I think, and you were starting to get to
3 this, you say in your complaint that you were, you
4 communicated with WCW to explain to them that you wanted to
5 wrestle with WCW in addition to sending the tapes; is that
6 right?

7 A Yes.

8 Q And you called people at WCW?

9 A I called J.J.

10 Q Anybody other than J.J. that you recall
11 calling?

12 A No.

13 Q Do you remember when you called J.J.?

14 A Numerous times.

15 Q A half dozen times?

16 A More.

17 Q A dozen times?

18 A More.

19 Q How often did you call J.J.?

20 A I mean, they -- I would say six, seven times
21 a month maybe.

22 Q How many months did you keep that up?

23 A A couple months.

24 Q More than six months?

25 A Yes.

1 Q More than a year?

2 A Yes.

3 Q How much more than a year?

4 A I'm not sure.

5 Q Was this in the 1995, '96 time frame, do you
6 believe?

7 A It was afterwards, after that. It was
8 probably about up to '98, '99.

9 Q But you don't recall exactly when it was
10 that you called Mr. Dillon?

11 A Probably '98 and '99.

12 Q So you think all these calls came in '98 or
13 '99?

14 A I mean, during that whole period from --

15 Q Are you telling me you called him six or
16 seven times a month for four years?

17 A I would guess.

18 Q You really just called him six or seven
19 times a month for four years?

20 A Oh, I was --

21 MS. ROTHENBERG: Objection. Asked and answered.

22 BY MR. PONTZ:

23 Q That's your testimony under oath today?

24 A Yes.

25 Q Did you ever speak to Mr. Dillon on any of

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1 these phone calls?

2 A He never took my call.

3 Q So did you leave a message?

4 A Oh, yeah.

5 Q What was the message?

6 A "Call Rick Reeves. You know, I've been
7 calling you. I sent you these tapes." You know, that
8 wasn't the message all the time, but I just, sometimes I
9 just asked him to give me a call back.

10 Q Who did you leave the message with? Was it
11 on a voicemail?

12 A Whoever answered the phone.

13 Q With a person?

14 A Yeah.

15 Q Was it ever on voicemail?

16 A I guess. I mean, I -- he had a voicemail,
17 so I did leave some messages there.

18 Q But it's your recollection most of the time
19 was with a live person?

20 A Yeah.

21 Q Do you know if Mr. Dillon ever got the
22 messages you left with a live person?

23 A I have no idea.

24 Q And you don't know whether he ever got the
25 voicemails that you left if you left voicemails?

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1 Q And at some point, you came to the belief
2 that the reason Mr. Dillon wasn't giving you wrestling
3 opportunities was because of your race?

4 A That's correct.

5 Q When did you come to that belief?

6 A I can't say exactly. But you know, when I
7 wasn't getting my phone calls returned and then, you know,
8 I'd hear about a lot of guys getting employed and a lot of
9 white guys, and that I felt like I was qualified, as
10 qualified, we had the same ability and the same talent and
11 they were given opportunities and I wasn't, that's when I
12 kind of came to the conclusion that it had to be about
13 race.

14 Q Do you think this was after maybe a year or
15 two of calling J.J. or before that?

16 A Probably after a year or two.

17 Q You came to the conclusion it must be about
18 race?

19 A Yes.

20 Q And that was just based on the fact that he
21 wasn't calling you back and you saw, I guess you saw white
22 wrestlers on TV?

23 A Well, and then I used to talk to some of the
24 guys that were still working --

25 Q Who did you talk to?

1 A -- down there.

2 Rocky King, Pez Whatley.

3 Q Anybody else?

4 A That's all I can remember right now.

5 Q And was it these gentlemen's opinion that
6 you weren't getting an opportunity because of your race?

7 A Well, not that, not necessarily their
8 opinion, but you know, they were telling me about, look,
9 all these other guys are coming in and getting jobs and
10 getting employed and --

11 Q And you drew the conclusion that you were as
12 qualified as them, so it must be because of your race?

13 A That's correct.

14 Q Mr. King or Mr. Whatley never said, hey,
15 anybody said anything about you; right?

16 MS. ROTHENBERG: Objection. Vague.

17 BY MR. PONTZ:

18 Q Did they ever say that your name ever came
19 up in any conversations at WCW?

20 A Not that I know of.

21 Q And the only person you recall calling is
22 J.J. Dillon?

23 A Or Terry Taylor.

24 Q When did you call Terry Taylor?

25 A Around that same period of time when I was

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1 calling him, too. He left and went, I mean, he went up to
2 New York and then he came back down. But I was calling
3 him, too.

4 Q You called him before he left?

5 A And when he came back. I can't remember the
6 date.

7 Q How many times do you remember calling
8 Mr. Taylor?

9 A I called him quite a bit.

10 Q Had you ever met Mr. Taylor?

11 A Oh, yeah.

12 Q Where did you meet Mr. Taylor?

13 A I met him several times, over at the Ramada
14 Hotel.

15 Q What did you do, what were you doing at the
16 Ramada Hotel that you met Terry Taylor?

17 A Well, that's where a lot of the guys stayed.
18 You know, the wrestlers were out there, too. And it was,
19 like, a hang-out for all the guys.

20 Q Did you ever talk to him?

21 A Oh, yeah.

22 Q What were your conversations about?

23 A About asking him for a job.

24 Q And what did Mr. Taylor say?

25 A You know, he just said, "We got enough of

1 y'all boys already," stuff like that.

2 Q You don't know what he meant by that, do
3 you?

4 A Well, I mean, it was offensive to me, but I
5 couldn't tell you what he meant.

6 Q You found the phrase "boys" offensive?

7 A Oh, yeah.

8 Q Because it was offensive to you as an
9 African American?

10 A Yes.

11 Q Do you know if Mr. Taylor ever referred to
12 just young wrestlers as boys, regardless of their race?

13 A No. I don't know whether he --

14 Q And you never sent any of these videotapes
15 to Mr. Taylor, did you?

16 A I think I might have gave him some tapes.

17 Q Physically gave him some tapes at the
18 Ramada?

19 A Yeah.

20 Q Do you know whether you did that or not?

21 A I know I gave him some. I don't know how
22 many tapes I gave him.

23 Q Do you know if he ever looked at the tapes?

24 A No. I don't know.

25 Q So you don't know if Mr. Taylor ever

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1 Q With Jody Hamilton?

2 A Yeah.

3 Q Did you just talk to Mr. Hamilton?

4 A Yeah.

5 Q You never wrestled down there, did you?

6 A No. I asked, you know, I asked Jody about
7 could he help me, you know, or who else do I need to talk
8 to to get a job.

9 Q What did Mr. Hamilton say?

10 A Well, he said, you know, "We got enough of
11 your kind down here," and you know, just different, I mean,
12 different things.

13 Q Can you remember anything else other than
14 that?

15 A That's all I can recall right now.

16 Q And you don't know what Mr. Hamilton meant
17 by "enough of your kind," do you?

18 A Well, I assumed it to be that, you know,
19 enough, got enough blacks down here, we don't need any
20 more. That's what I assumed.

21 Q But you don't know if he may have meant just
22 enough people coming in asking us for wrestling
23 opportunities, do you?

24 A I can't answer that.

25 Q You don't know?

1 A I can't answer that.

2 Q Well, it's true you don't know what he meant
3 by that; right?

4 A No.

5 Q It's not true or you --

6 A I don't know what he meant.

7 Q And you never trained at the Power Plant?

8 A No.

9 Q Did you ever ask anybody for an opportunity
10 to spend some time training at the Power Plant?

11 A Jody.

12 Q What did he say?

13 A I just told you.

14 Q Did you offer to pay the training fee and
15 start training at the Power Plant?

16 A Yeah. I asked Jody could I start training
17 down here, and he responded just the way I just told you.

18 Q Did you offer to pay \$3,000 and start
19 training at the Power Plant?

20 A I asked Jody could I start training.

21 Q You never mentioned whether you were willing
22 to pay for it or not?

23 A We never got that far in the conversation.

24 Q When was this conversation with

25 Mr. Hamilton? Do you recall?

1 A That's correct.

2 Q Was it your understanding that wrestlers
3 signed independent contractor agreements with WCW?

4 A What do you mean "independent contractor
5 agreements"?

6 Q When wrestlers signed contracts with WCW, is
7 that what you were looking for, to sign a deal with them, a
8 contract?

9 A That's correct.

10 Q Do you know what those contracts look like?

11 A I've never seen one.

12 Q You don't know what the terms of those
13 contracts were?

14 A I imagine some of them are different. I
15 don't know whether all of them were the same or not.

16 Q So you don't know whether WCW wrestlers were
17 independent contractors or not?

18 A I thought that they were employees.

19 Q But you don't know?

20 A I don't know.

21 Q And how much, how many times do you remember
22 going to the Power Plant?

23 A Probably about ten times.

24 Q Why did you go to the Power Plant ten times?

25 A To talk to Jody. Sometimes he wasn't there,

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1 A Me particularly?

2 Q Yes. You.

3 A I don't know.

4 Q And I think you started to get into this
5 earlier, but tell me what white wrestlers you believe got
6 opportunities at WCW that you believe you should have
7 gotten?

8 A Kevin Nash, Chuck Palumbo, Stan Stasiak,
9 Dallas Page, Billy Kidman. I'm trying to think of others.

10 Q Take your time.

11 A Perry Saturn. That's all I can recall right
12 now.

13 Q We talked about Mr. Nash before.
14 Mr. Palumbo, do you know who decided to give him a
15 wrestling opportunity at WCW?

16 A No.

17 Q Do you know what Mr. Palumbo's experience
18 was in wrestling before he came to WCW?

19 A No.

20 Q Diamond Dallas Page, DDP, do you know who
21 gave him an opportunity to wrestle at WCW?

22 A Do I have personal knowledge?

23 Q Yes. Do you know?

24 A Personally. I don't understand the question
25 because --

1 A Well, you know, he said that, you know, it's
2 a possibility and, you know, send your tapes in and see
3 what happens. You know, he didn't guarantee me anything.

4 Q And you never got an opportunity to wrestle
5 with WWF?

6 A No.

7 Q Do you believe that was because of your
8 race?

9 A I don't know.

10 Q You don't know why you didn't get an
11 opportunity at WWF?

12 A No.

13 Q Other than contacting WWF through Mr. Long,
14 as you said, all of those times, have you contacted WWF at
15 any other point?

16 A Other than '97, '98 and '99, no.

17 Q All right. Mr. Reeves, I take it that one
18 of the bases of your complaint is that you're claiming that
19 you didn't receive a contract as a wrestler with WCW
20 because of your race.

21 Is that one of your claims?

22 A That's correct.

23 Q And when is it that you believe you were
24 denied a contract to work with WCW?

25 A From '99 back to '93.

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1 Q And other than the people we mentioned, did
2 you talk to anybody else about trying to get a contract
3 with WCW that you can recall?

4 MS. ROTHENBERG: Objection. Asked and answered.
5 You can go ahead and answer.

6 THE WITNESS: Other than what I told you. Because
7 you really didn't have access to just talk to anybody else,
8 so I contacted who I could contact to seek employment.

9 BY MR. PONTZ:

10 Q Is there anything else that you haven't told
11 me yet that supports your belief and you believe supports
12 your claim that you weren't given a contract because of
13 your race?

14 A Well, just different conversations that, you
15 know, I had at Ramada. You know, the "N" word was used
16 quite a bit over there.

17 Q Well, what were those conversations? Tell
18 me about them.

19 A Well, you know, I heard Terry Taylor use the
20 "N" word quite a bit.

21 Q In conversations he was having with other
22 people?

23 A With other people.

24 Q He never used that word with you, did he?

25 A No. He didn't ever specifically, you know,

1 Q And you remember going to TV tapings in
2 1995?

3 A I went to some.

4 Q Do you remember going to any TV tapings in
5 1996?

6 A A few. Not as many.

7 Q Do you remember going to any TV tapings in
8 1997?

9 A I don't think I -- I'm not sure.

10 Q Do you think you might have stopped going to
11 TV tapings sometime in 1997 or before that?

12 A I'm not sure. I really just can't remember.

13 Q So you don't have any recollection of
14 whether you went to TV tapings in 1998 or 1999 or 1997, do
15 you?

16 A I went to some, but I just can't remember
17 the exact dates and years. I just, I really can't
18 remember.

19 Q Do you remember where the last TV taping you
20 can recall going to was held?

21 A No.

22 MS. ROTHENBERG: Are we going to lunch?

23 MR. PONTZ: Yes. Why don't I go a few more
24 minutes, and then we'll take a lunch break, if that's okay
25 with you, Mr. Reeves?

1 I should have been working for them. And those were
2 productive years and years that are gone now and I can't
3 get them back. And I think that that was, that personally
4 affected me, you know.

5 Q Anything else you can think of?

6 A It's also caused some problems at my
7 household, my wife. You know, I was trying to work and
8 wrestle and pursue my career. And it caused some tension
9 between us.

10 Q But there's nothing else you can think of
11 other than not getting a contract and not getting wrestling
12 opportunities and the comments you say you heard that you
13 believe WCW did to you, any actions they took other than
14 what we've already talked about; right?

15 A Not that I know of.

16 Q Would you agree with me that wrestlers are
17 kind of like actors and athletes combined?

18 A That would be a fair assumption.

19 Q That you know, a lot of your wrestling has
20 to do with your imagination and your invention and your
21 creativity as a wrestler?

22 A I would agree and disagree. Because you
23 know, you were actually told what to do. And you know,
24 they kind of created, whatever your gimmick was, they
25 created it. So you know, you, it was more of the

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1 MS. ROTHENBERG: Objection. Mischaracterizes his
2 testimony.

3 BY MR. PONTZ:

4 Q Did you ever have a professional
5 relationship with WCW or Turner Sports that you're aware
6 of?

7 A Well, I was told to come to TV tapings, so I
8 interpreted that to mean we had a relationship.

9 Q Other than being told to come to TV tapings,
10 anything else that you believe created a professional
11 relationship?

12 A Not that I can think of right now.

13 Q Your response to that request for production
14 of documents was that plaintiff will produce non-privileged
15 responsive documents in your possession, custody or
16 control.

17 Do you have any documents you ever received
18 from WCW?

19 A No.

20 Q So you don't know why it says you'll produce
21 documents there?

22 A I don't know what documents we're referring
23 to.

24 Q You don't have any documents you ever got
25 from WCW or Turner Sports?

1 earned through merchandising money if you had wrestled with
2 WCW?

3 A I don't know what a dollar figure would be.
4 No, I don't.

5 Q Well, what kind of merchandising revenues
6 are you aware of that might have been possible?

7 A You know, I've heard some guys, you know,
8 were making two or three hundred thousand, four or five
9 hundred thousand off merchandising.

10 Q What guys are making that much money off
11 merchandising?

12 A I don't know the specific guys. I mean, you
13 know, these are just numbers that I've heard. They didn't
14 actually link them to a person.

15 Q Somebody just told you that you can make
16 hundreds of thousands of dollars in merchandising?

17 A Yeah.

18 Q Who told you that?

19 A I mean, I've -- I'm trying to think of --
20 you know, this is not like a conversation I'm having with
21 somebody, this is a conversation that I'm just overhearing.
22 And I really can't remember who was, you know, who was
23 doing all the talking.

24 Q You don't know who made merchandising
25 decisions, if anyone, at WCW, do you?

1 pay it?

2 A Paid it.

3 Q Did you agree with it or just pay it?

4 A Just paid it.

5 Q Do you know whether it had anything to do
6 with money you'd received from wrestling opportunities?

7 A No. It didn't have anything to do with
8 wrestling.

9 Q It had nothing to do with wrestling?

10 A Huh-uh.

11 Q You remember that it had nothing to do with
12 wrestling?

13 A Uh-huh.

14 Q But you don't remember what it was exactly?

15 A No.

16 Q But other than the normal concern about
17 getting audited and having to pay more taxes, you don't
18 have any reason to believe that you're going to be in
19 trouble in a criminal sense for problems with your taxes,
20 do you?

21 A I hope not. I don't know.

22 Q Well, let me ask the question again. We'll
23 see what your lawyer decides to do. But are you aware of
24 whether you included the money you received from wrestling
25 in 2000 on your 2000 tax returns?

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1 MS. ROTHENBERG: Objection.

2 I'm going to instruct you not to answer on
3 the grounds that you might incriminate yourself.

4 MR. PONTZ: You're not going to let me ask anything
5 about whether he reported any of his wrestling fees on any
6 of his taxes that we have?

7 MS. ROTHENBERG: No, I'm not.

8 MR. PONTZ: Well, we'll make the decision about
9 whether we're going to file a motion to compel on those
10 matters or not.

11 MS. ROTHENBERG: Sounds good.

12 (Whereupon, the court reporter
13 marked Defendant's Exhibit 4
14 for identification.)

15 BY MR. PONTZ:

16 Q Mr. Reeves, let me hand you what's been
17 marked Defendant's Exhibit 4. And these, again, are part
18 of the documents that you provided to your lawyer that were
19 provided to us today.

20 And these appear to be income tax forms from
21 1999, the first page from the Georgia State income tax and
22 the rest of the pages from your federal tax; is that
23 correct?

24 A That's correct.

25 Q And it appears on the second page of this

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

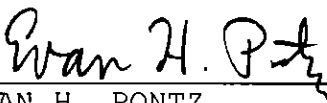
RICK REEVES,)	
)	
Plaintiff,)	
)	CIVIL ACTION FILE
v.)	
)	NO. 1:00-CV-1720-CC
WORLD CHAMPIONSHIP WRESTLING, INC.,)	
TURNER SPORTS, INC. and TURNER,)	
BROADCASTING SYSTEM, INC.,)	
)	
Defendants.)	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of
DEFENDANTS' APPENDIX OF DEPOSITION EXCERPTS AND EXHIBITS upon
the interested parties by hand delivery to:

Cary Ichter
Kelly Jean Beard
Charles Gernazian
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This 8th day of January, 2003.


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